

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:22-CR-29

Hon. Robert J. Jonker

BRENDON GAGNE,

Defendant.

DEFENDANT BRENDON GAGNE'S MOTION FOR DOWNWARD VARIANCE

Mr. Gagne respectfully makes a motion for downward variance in his sentence. In addition to disputing the Government's calculated Guideline range, Mr. Gagne asks the Court to hold that the purposes of sentencing found in the 18 U.S.C. § 3553 factors could be met with a below Guideline range sentence, for the reasons explained in the accompanying sentencing brief.

Pinsky Smith, PC
Attorneys for Defendant

Dated: August 15, 2023

By: /s/ Sarah R. Howard
Sarah Riley Howard
146 Monroe Center St NW, Suite 418
Grand Rapids, MI 49503
(616) 451-8496
showard@pinskysmith.com